

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO:
All Actions

**PLAINTIFFS' NOTICE OF MOTION TO AUTHORIZE DISSEMINATION OF
CLASS NOTICE AND TO SCHEDULE FAIRNESS HEARING**

PLEASE TAKE NOTICE THAT, upon Plaintiffs' Memorandum of Law in Support of Motion of Support to Authorize Dissemination of Class Notice and to Schedule Fairness Hearing, dated October 19, 2010, and all other papers and proceedings herein, plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure to enter an order in connection with the four settlements entered between plaintiffs and the following defendants (1) Société Air France, Koninklijke Luchtvaart Maatschappij N.V., and Martinair Holland N.V.; (2) Japan Airlines International Co., Ltd.; (3) AMR Corp. and American Airlines, Inc.; and (4) Scandinavian Airlines System and SAS Cargo Group A/S:

- i. directing settlement class counsel to disseminate notices to the settlement class;
- ii. setting a deadline for class members to exclude themselves from any or all of the four settlements;
- iii. setting deadlines for class members to serve and file any objections to any or all of the four settlements and plaintiffs' request for litigation expenses;
- iv. scheduling a Fairness Hearing to (a) determine the fairness, reasonableness, and adequacy of the four settlements, and whether each should be finally approved by the Court; and (b) evaluate plaintiffs' request for litigation expenses; and
- v. granting such other and further relief as may be appropriate.

Dated: New York, New York
October 19, 2010

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